

# COHEN & GREEN

May 1, 2020

Hon. Analisa Torres, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 15D  
New York, NY 10007

By ECF and Email.

**Re: Motion to Intervene in *Yang, et al. v. New York State Board of Elections*, Case No. 20-cv-03325 (AT)**

Dear Judge Torres:

As Your Honor knows, our firms represent the Proposed Plaintiff-Intervenors, whose names and interests in the case are set out in the attached formal Memorandum of Law and Complaint in Intervention.

We are submitting this motion pursuant to Your Honor's Order of yesterday night, stating that our "motion to intervene and supporting memorandum shall be filed by May 1, 2020." ECF No. 14.

Plaintiffs appear to consent to the motion (ECF No. 15 at 5, "counsel for Plaintiffs has not yet had time to consider potential intervenors. Generally and notwithstanding Plaintiffs' rights, counsel submits the more voices that are heard the better to protect our democracy and right to vote."). However, Defendant(s) have not responded to our communications one way or another.

Finally, an early, non-final version of the Complaint in Intervention was inadvertently filed due to miscommunications within our legal team. ECF No. 25. We apologize for the confusion and ask that the Court and all parties disregard that document. Of course, without the accompanying motion, we would not be able to file such a Complaint. *See e.g.*, Court's Order at ECF No. 14.

Should the Court have any questions, my cell phone number is provided in the email to Chambers.

Respectfully submitted,

/s/

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**ADVOCATES FOR JUSTICE**

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cc:  
All relevant parties by ECF.